

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JIMMY RAY STRICKLIN

Plaintiff,

VS.

M.D. MCDONALD COMPANY, RYAN
COMMONS, DALLAS COUNTY,
EDWARD WRIGHT, and MARTHA RAND
Defendants.

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CIVIL ACTION NO. 3:19-cv-02489-M

DEFENDANT EDWARD WRIGHT'S NOTICE OF CLARIFICATION

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Dallas County Constable Edward Wright (“Constable Wright”), files this Notice of Clarification regarding the Notice of Removal he filed yesterday in the above-referenced case. On September 19, 2019, Dallas County, Dallas County Deputy Constable Martha Rand and Dallas County Constable Edward Wright were all named as defendants in the lawsuit styled *Jimmy Ray Stricklin vs. M.D. McDonald Company, et al*, case number DC-19-00815, pending in the 14th District Court, Dallas County, TX. After filing a Plea to the Jurisdiction and Original Answer, Constable Wright filed his Notice of Removal in this Court based on Federal Question Jurisdiction. Earlier that day, Defendants Dallas County and Dallas County Deputy Constable Martha Rand also filed their Notice of Removal of the same case based on the same grounds. That case was assigned to this Court. Defendants Dallas County and Dallas County Deputy Constable Martha Rand’s Notice of Removal did not explicitly state that Constable Wright

consented to the removal of the above-referenced action. Accordingly, out of an abundance of caution Constable Wright submitted his separate Notice of Removal to this Court.

Constable Wright acknowledges Defendants Dallas County's and Dallas County Deputy Constable Martha Rand's Notice of Removal and consents to removal pursuant to 28 U.S.C. § 1446(b)(2)(A).

Respectfully submitted,

WHITE & WIGGINS, L.L.P.

/s/ Kevin B. Wiggins

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**ATTORNEYS FOR DEFENDANT
EDWARD WRIGHT**

CERTIFICATE OF SERVICE

I certify that on October 22, 2019, I caused the foregoing Answer to be electronically filed with the Clerk of the Court which will send electronic notice to all counsel of record.

/s/ Kevin. B. Wiggins

Kevin B. Wiggins